

To: Karen Schwinn/R9/USEPA/US@EPA;Tom Hagler/R9/USEPA/US@EPA[]; om Hagler/R9/USEPA/US@EPA[]
From: "Nawi, David"
Sent: Wed 4/11/2012 12:03:09 AM
Subject: FW: BDCP NEPA Baseline

From: Monroe, Jim
Sent: Tuesday, April 10, 2012 3:24 PM
To: Nawi, David; Michael.Tucker@NOAA.GOV; Chotkowski, Michael; Barajas, Federico; Rinek, Lori; Beggs, Barbara; Shelby Mendez
Cc: 'Deanna Harwood'; Allen, Kaylee
Subject: BDCP NEPA Baseline

David,

I spoke with Ken Bodgan at ICF on the topic of baseline. I was told that the environmental document was evaluating the proposed alternatives against three baselines; one CEQA and two NEPA. Most important to me is that he confirmed that one of the two NEPA baselines is current conditions, with Fall X2, evaluated to the Late Long Term and including climate change and sea level rise. I believe this is consistent with my statements on the Monday call and the draft CEQ guidance, as well as with guidance previously provided by myself, Deanna, and Kaylee. For NEPA purposes, this should be adequate.

My understanding was that the second NEPA baseline was current conditions with Fall X2, but for a shorter duration, with a purpose of understand operational impacts of the alternatives in the four water year types. While I think this might be superfluous, DWR seems to want it for some reason. However, its existence seems to have contributed to the current confusion on this topic. All three alternatives (including the freakish CEQA "snapshot" baseline, driven by the City of Sunnyvale decision) were all placed on the same graphic. Without having seen the graphic, I can imagine the confusion this could cause. Ken told me that he had recommended on graph for each baseline, but was vetoed by DWR. DWR has not released those graphics for review by the other agencies, so Ken was not able to send me a set. This may be topic of discussion eventually, but would not seem to be a NEPA flaw, other than that it may make the document confusing to the educated lay reader.

Jim

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"You cannot be memorably funny without at some point raising topics which the rich, the powerful and the complacent would prefer to see left alone." - George Orwell